

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

| | | |
|---|---|--------------------------------|
| FREDERICK J. GREDE, not individually but as |) | |
| Liquidation Trustee of the Sentinel Liquidation |) | |
| Trust, |) | |
| |) | Honorable Rebecca R. Pallmeyer |
| Plaintiff, |) | |
| v. |) | |
| |) | Case No. 09-cv-00138 |
| ABN AMRO CLEARING CHICAGO LLC |) | |
| (f/k/a FORTIS CLEARING AMERICAS, LLC), |) | |
| |) | |
| Defendant. |) | |

**ABN AMRO CLEARING CHICAGO LLC’S MOTION FOR ENTRY OF
JUDGMENT ON COUNTS I THROUGH V OF THE TRUSTEE’S
SECOND AMENDED COMPLAINT**

Defendant, ABN AMRO Clearing Chicago LLC (f/k/a Fortis Clearing Americas, LLC) (“ABN”), respectfully submits this Motion for Entry of Judgment on Counts I through V of the Trustee’s Second Amended Complaint. Specifically, ABN seeks an Order from the Court: (1) entering judgment in ABN’s favor and against the Trustee on Counts I through V of the Trustee’s Second Amended Complaint; (2) directing the Trustee to pay ABN its pro rata share of the SEG 1 Reserve, the Section 7.20(b) Disputed Claims Reserve, and the SEG 2 Reserve within seven days of this Court’s entry of judgment on Count III; and (3) granting all other just relief.

A Memorandum of Law has been submitted herewith.

Accordingly, in view of the arguments in the accompanying memorandum, ABN respectfully requests that the Court GRANT its Motion for Entry of Judgment on Counts I through V of the Trustee’s Second Amended Complaint.

Dated: October 13, 2017

Respectfully submitted,

ABN AMRO CLEARING CHICAGO LLC
(f/k/a FORTIS CLEARING AMERICAS,
LLC)

By: /s/ Geoffrey S. Goodman

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CERTIFICATE OF SERVICE

I, Peter J. O'Meara, an attorney, hereby certify that on October 13, 2017, I electronically filed the foregoing ABN AMRO Clearing Chicago LLC's MOTION FOR ENTRY OF JUDGMENT ON COUNTS I, II, IV and V with the Clerk of the Court using the CM/ECF system, which caused the same to be served on all counsel of record via ECF filing.

By: /s/ Peter J. O'Meara
One of its attorneys